

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VOIP-PAL.COM, INC.

Plaintiff,

v.

T-MOBILE USA, INC.

Defendant.

CIVIL ACTION NO. 6:21-cv-674-ADA

**REPLY DECLARATION OF MARTIN E. GILMORE IN
SUPPORT OF T-MOBILE'S AMENDED MOTION TO AMEND ITS ANSWER AND
COUNTERCLAIMS TO ADD ALLEGATIONS OF INEQUITABLE CONDUCT**

I, Martin E. Gilmore, hereby declare as follows:

1. I am an attorney admitted to practice before this Court and am counsel for Defendant T-Mobile USA, Inc. (“T-Mobile”). I am over 18 years of age and competent to make this declaration. If called to testify as a witness, I could and would testify truthfully under oath to each of the statements in this declaration. I make each statement below based on my personal knowledge of the relevant information.

2. Attached as Exhibit Z is a true and correct copy of an email chain between various parties and titled “VoIP-Pal: Motion to compel VP to produce emails.” This chain includes an email from myself, Martin Gilmore, sent on November 15, 2022 and an email from Lewis Hudnell sent on November 17, 2022. Highlighting was added to certain portions of Exhibit Z to draw attention to relevant material.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 8, 2023

By: /s/ Martin E. Gilmore
Martin E. Gilmore